

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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ARIEL RIVERA,  
Plaintiff,

CASE NO. \_\_\_\_\_

vs.

TRANSUNION RENTAL SCREENING  
SOLUTIONS, INC.,  
Defendant.

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**TRANS UNION RENTAL SCREENING SOLUTIONS, INC.'S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union Rental Screening Solutions, Inc. (“Trans Union”) hereby removes the subject action from the Court of Common Pleas of Montgomery County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania, on the following grounds:

1. Plaintiff Ariel Rivera served Trans Union on March 5, 2019, with a Notice To Defend (“Notice”) and Complaint (“Complaint”) filed in the Court of Common Pleas of Montgomery County, Pennsylvania. Copies of the Notice and Complaint are attached hereto as **Exhibit A** and **Exhibit B**, respectively. No other process, pleadings or orders have been served on Trans Union.

2. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.* (the “FCRA”). *See* Complaint ¶¶ 1 and 4-19.

3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

4. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the Court of Common Pleas of Montgomery County, Pennsylvania, to the United States District Court for the Eastern District of Pennsylvania.

5. Notice of this removal will promptly be filed with the Court of Common Pleas of Montgomery County Pennsylvania and served upon all adverse parties.

WHEREFORE, Defendant Trans Union Rental Screening Solutions, Inc., by counsel, removes the subject action from the Court of Common Pleas of Montgomery County, Pennsylvania, to this United States District Court, Eastern District of Pennsylvania.

Date: 3-22-19

Respectfully submitted,



/s/ Casey B. Green

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*Counsel for Defendant TransUnion Rental  
Screening Solutions, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the 22<sup>nd</sup> day of March, 2019. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the 22<sup>nd</sup> day of March, 2019 properly addressed as follows:

<b><u>for Plaintiff Ariel Rivera</u></b> Vicki Piontek, Esq. 951 Allentown Road Lansdale, PA 19446	
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/s/ Casey B. Green

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*Counsel for Defendant TransUnion Rental  
 Screening Solutions, Inc.*